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**UNOPPOSED MOTION REQUESTING PERMISSION TO TRAVEL
AND REQUEST TO ADJOURN SENTENCING ON CONSENT**

June 21, 2024

VyskocilNYSdChambers@nysd.uscourts.gov

Hon. Mary Kay Vyskocil
Daniel Patrick Moynihan
United States Courthouse
500 Pearl Street
New York, NY 10007-1312

Re: United States of America vs. Jonathan Gaverilof
Docker Number: 23 Cr. 110 (MKV)

Dear Judge Vyskocil:

As you are aware this firm represents the defendant, Jonathan Gavrielof, in the aforementioned matter. The reason for this correspondence is twofold.

First, consistent with earlier applications of February 7, 2024, and April 25, 2024, on behalf of Mr. Gavrielof, I am hereby respectfully requesting permission to modify his bond conditions and permit him to travel to Florida for medical treatment of his daughter at ImmunoHealth and Research Center, 19111 Collins Avenue, Sunny Isles Beach, Florida 33160. Presently they have a follow up appointment with Dr. Marina Rosenstein, MD PhD, Certified Nutrition Specialist. Mr. Gavrielof, will be traveling on Jet Blue Airlines, leaving from JFK Airport on July 7, 2024, and returning from Fort Lauderdale on July 12, 2024.

Second, Jonathan Gavrielof's sentencing was originally scheduled for June 26, 2024, however the Court re-scheduled same to July 31, 2024. Please be advised that from Tuesday, July 23, 2024 through Tuesday, August 13, 2024, are the Jewish Holidays of Tisha B'Av. This is in observance of the destruction of the Holy Temple. Accordingly, it is respectfully requested that this matter be adjourned to another date convenient to the government and the Honorable Court, so long as said date does not interfere with any of the Jewish Holidays. I sincerely apologize for any and all inconveniences caused by this request.

AUSA Jeffery Coyle, and Officer Berglind from U.S. Pretrial Services have been contacted and indicated that they have no opposition to both requests.

Accordingly, Mr. Gavrielof, and I respectfully pray this Honorable Court grant (a) the modification of bail and (b) adjournment of sentencing as requested. The Court's time and attention to this matter are greatly appreciated.

Respectfully submitted,

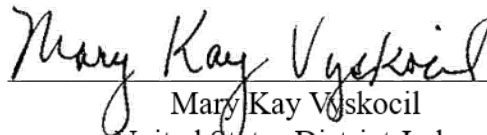
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GRANTED. Defendant shall provide Pretrial Services his itinerary, including flight details before leaving. Additionally, Defendant shall be required to check in with Pretrial Services each day between July 7, 2024 and July 12, 2024.

IT IS FURTHER ORDERED that Defendant's sentencing currently scheduled for July 31, 2024 is hereby **ADJOURNED** to August 28, 2024 at 2:00 PM upon defense counsel's request.

SO ORDERED.

Date: 6/24/2024
New York, New York


Mary Kay Vyskocil
United States District Judge